

Exhibit 14

Marty Tripp Deposition Excerpts

~~Martin Tripp-Confidential~~

1 THE DEPOSITION OF MARTIN TRIPP was taken
2 on September 4, 2019, at 9:01 a.m., at the Law
3 Office of Tiffany & Bosco, P.A., 2525 East Camelback
4 Road, Seventh Floor, Phoenix, Arizona 85016-9240,
5 before DAVID M. LEE, RMR, CRR, a Certified Reporter,
6 Certificate Number 50391.

7

8 FOR THE PLAINTIFF/COUNTER-DEFENDANT:

9 CHARIS LEX, P.C.
10 BY: SEAN P. GATES, ESQ.
301 North Lake Avenue
Suite 1100
11 Pasadena, California 91101
(626) 508-1717
12 (626) 508-1730
sgates@charislex.com

13

14 FOR THE DEFENDANT/COUNTER-PLAINTIFF:

15 TIFFANY & BOSCO, P.A.
BY: ROBERT D. MITCHELL, ESQ.
WILLIAM M. FISCHBACH, III, ESQ.
16 2525 East Camelback Road
Seventh Floor, Camelback Esplanade II
17 Phoenix, Arizona 85016-9240
(602) 255-6000
18 (602) 255-0103
rdm@tblaw.com
19 wmf@tblaw.com

20 ALSO PRESENT:

21 ROBERT L. WHITENER, VIDEOGRAPHER

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23

24

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09:38 1 release out. I never saw a public release of that.

09:38 2 Q. The fact of the Sheriff's investigation was
09:38 3 reported by the press.

09:38 4 A. Could you repeat that, please?

09:39 5 Q. The Sheriff's investigation of you, where
09:39 6 they cleared your name, was reported by the press;
09:39 7 correct?

09:39 8 A. I believe so.

09:39 9 Q. So anybody who goes onto Google and looks
09:39 10 at all of the reports about the Gigafactory threat
09:39 11 sees that your name was cleared by the Sheriff's
09:39 12 Department.

09:39 13 MR. FISCHBACH: Object to foundation.

09:39 14 Answer if you can.

09:39 15 THE WITNESS: It's possible.

09:39 16 Q. BY MR. GATES: So you said earlier that you
09:39 17 had sold your firearms before June 20th of 2018. Is
09:39 18 that right?

09:39 19 A. That is correct.

09:39 20 Q. Okay. So bef- -- before you moved to Nevada
09:39 21 to work for Tesla, at that point what firearms did
09:40 22 you own?

09:40 23 A. When?

09:40 24 Q. Six months before you moved to Nevada.

09:40 25 A. I believe I -- excuse me.

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09:40 1 I believe I would have owned an AR-15
09:40 2 and a P238, and possibly a 9 millimeter.

09:40 3 Q. Another weapon, a 9 millimeter?

09:40 4 A. Yes.

09:40 5 Q. Did you own the Hi-Point?

09:40 6 A. Yes, thank you. A Hi-Point 9 millimeter
09:40 7 carbine.

09:40 8 Q. So you had three weapons.

09:40 9 A. Four.

09:40 10 Q. Four. Okay.

09:40 11 Oh, the Hi-Point, and in addition, a 9
09:40 12 millimeter Hi-Point.

09:40 13 A. Yes.

09:40 14 Q. Okay. The AR-15, which manufacturer?

09:40 15 A. I don't remember the company based out of
09:40 16 Illinois.

09:40 17 Q. It wasn't Colt?

09:41 18 A. No, it was not a name brand, it was veteran-
09:41 19 built.

09:41 20 Q. Full length barrel?

09:41 21 A. Excuse me?

09:41 22 Q. It was a full length barrel?

09:41 23 A. Yes.

09:41 24 Q. Did you have a rail system?

09:41 25 A. Yes.

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09:41 1 Q. What did you have on the rail?

09:41 2 A. I believe a red dot -- dot sight and --

09:41 3 Q. Tell us -- just tell us what a red dot
09:41 4 sight is.

09:41 5 A. It just puts a red dot on whatever you're
09:41 6 aiming at.

09:41 7 Q. Okay. What else did you have on the rail?

09:41 8 A. I believe I had a scope for competitive
09:41 9 shooting.

09:41 10 Q. How many rounds did the magazine carry?

09:41 11 A. For which gun?

09:41 12 Q. For the AR-15.

09:41 13 A. Thirty.

09:41 14 Q. And you said you had a P238.

09:42 15 A. Yes.

09:42 16 Q. And that's a Sig Sauer?

09:42 17 A. I believe so, yes.

09:42 18 Q. Semiautomatic pistol.

09:42 19 A. Yes.

09:42 20 Q. What round did it chamber?

09:42 21 A. I believe 9 or 10.

09:42 22 Q. And what was the capacity of the magazine
09:42 23 for that?

09:42 24 A. Oh, oh, I'm sorry. To clarify, the round
09:42 25 that it chambered was a .238 round; the capacity

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09:42 1 was nine or ten rounds.

09:42 2 Q. And then in addition, you said you had a 9
09:42 3 millimeter.

09:42 4 A. I believe I had one at the time.

09:42 5 Q. Pistol.

09:42 6 A. Yes.

09:42 7 Q. Semiautomatic.

09:42 8 A. Yes.

09:42 9 Q. Did you shoot competitively?

09:42 10 A. Personally.

09:42 11 Q. So did you enter shooting competitions like
09:42 12 target competitions?

09:42 13 A. No, it was just myself and wife and friends.

09:42 14 Q. And the Hi-Point is a 9 millimeter carbine?

09:43 15 A. Correct.

09:43 16 Q. Did it have the forward pistol stock?

09:43 17 A. I don't remember. I -- I believe we had a
09:43 18 removable one on it. It was not an actual -- well,
09:43 19 it was adjustable.

09:43 20 Q. An adjustable stock.

09:43 21 A. Yes, that could turn into a bipod.

09:43 22 Q. And what kind of magazine did you have for
09:43 23 that?

09:43 24 A. I believe they're 10-round magazines.

09:43 25 Q. Were these all registered?

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09:43 1 A. Yes.

09:43 2 Q. So there was -- they were registered on
09:44 3 some database somewhere?

09:44 4 A. I don't know where they're registered. I
09:44 5 purchased them through FFL dealers, so they would
09:44 6 be registered somewhere through -- and the
09:44 7 background checks through the federal government or
09:44 8 state government.

09:44 9 Q. And what's an "FFL dealer"?

09:44 10 A. Federal firearms-licensed dealer.

09:44 11 Q. So you did the paperwork.

09:44 12 A. Absolutely.

09:44 13 Q. And when did you sell the AR-15?

09:44 14 A. I do not remember when; it was before I
09:44 15 moved.

09:44 16 Q. Was it a private sale?

09:44 17 A. Yes.

09:44 18 Q. Was it through an FFL dealer?

09:44 19 A. No, it was not.

09:44 20 Q. Did you file some kind of paperwork with
09:44 21 the government to show the transfer?

09:44 22 A. No, there's no requirement to do so.

09:44 23 Q. What about the P238; did you sell that one?

09:45 24 A. Yes.

09:45 25 Q. And was that a private sale as well?

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09:45 1 A. Yes.

09:45 2 Q. And it wasn't -- there was no paperwork
09:45 3 that you had to file for that sale.

09:45 4 A. Correct.

09:45 5 Q. And the 9 millimeter pistol, you sold that
09:45 6 as well?

09:45 7 A. Correct.

09:45 8 Q. Okay. And that was not through an FFL.

09:45 9 A. That is correct.

09:45 10 Q. So there's no paperwork that you filed with
09:45 11 the government for that.

09:45 12 A. Correct, there's no need to.

09:45 13 Q. And then the Hi-Point carbine, you brought
09:45 14 that to Nevada with you; correct?

09:45 15 A. That is correct.

09:45 16 Q. But you said you sold it prior to June 20th.

09:45 17 A. Yes.

09:45 18 Q. Was that to Patrick Shakal?

09:45 19 A. Yes.

09:45 20 Q. When did you sell it?

09:45 21 A. I believe May 16th, somewhere within that
09:45 22 week.

09:45 23 Q. Was that through an FFL dealer?

09:45 24 A. No, it was not.

09:45 25 Q. It was a private sale.

1 I CERTIFY that the foregoing deposition
2 was taken by me pursuant to Notice; that I was then
3 and there a Certified Reporter for the State of
4 Arizona, and by virtue thereof authorized to
5 administer an oath; that the witness before
6 testifying was duly sworn by me to testify to the
7 truth; that the questions propounded by counsel and
8 the answers of the witness thereto were taken down
9 by me in shorthand and thereafter transcribed under
10 my direction, and that the foregoing typewritten
11 pages contain a full, true, and accurate transcript
12 of all proceedings had upon the taking of said
13 deposition, all done to the best of my skill and
14 ability; that deposition review and signature was
15 requested.

16 I FURTHER CERTIFY that I am in no way
17 related to nor employed by any of the parties
18 hereto, nor am I in any way interested in the
19 outcome hereof.

20 DATED at Phoenix, Arizona, this 16th
21 day of September, 2019.

22 

23 _____
24 David M. Lee, RMR, CRR
25 Arizona Certificate No. 50391